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### ANNUAL AUDITED REPORT FORM X-17A-5 PART III

FACING PAGE
Information Required of Brokers and Dealers Pursuant to Section 17 of the
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING_	January 1, 2018	AND ENDING	December 31,	2018
	MM/DD/YY		MM/DD/YY	
A. REG	ISTRANT IDENTIFICA	TION		
NAME OF BROKER-DEALER: Inverne	ss Securities, LLC		OFFICIAL U	SE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSI	NESS: (Do not use P.O. Box 1	No.)	FIRM I.D	D. NO.
6060 Parkland Bi	vd, Ste. 200			
	(No. and Street)			
Cleveland	ОН		44124	
(City)	(State)	(	(Zip Code)	
NAME AND TELEPHONE NUMBER OF PEI	RSON TO CONTACT IN REG	ARD TO THIS RE	PORT	
Robert Renner, CPA	· · · · · · · · · · · · · · · · · · ·			-839-5133
<b>D</b> 4 CCC	OUNTANT IDENTIFICA		(Area Code - Telepho	one Number)
INDEPENDENT PUBLIC ACCOUNTANT wh Hobe & Lucas Certified Public Acc	countants, Inc.			
	Name – if individual, state last, first, n	niddle name)		
4807 Rockside Road, Suite 510	Independence		ОН	4413
(Address)  CHECK ONE:	(City)	Mail F	SEC (Zip ( Processing Section	Code)
Certified Public Accountant		rcc	3 2 8 2019	
☐ Public Accountant		1 L.L	7 6 7013	
Accountant not resident in United	l States or any of its possession	ıs. Wast	nington DC	
F	<u>OR OFFICIAL USE ONLY</u>	,	410	

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)



## OATH OR AFFIRMATION

I,	Robert Renner	, swear (or affi	rm) that, to the best of
my knov	vledge and belief the accompanying financi Inverness Securities, LLC	al statement and supporting schedules pertainin	g to the firm of
of	December 31		, as
		, 2018, are true and correct. I further swear	(or affirm) that
neither	the company nor any partner, proprietor, pri	incipal officer or director has any proprietary in	terest in any account
classifie	d solely as that of a customer, except as foll	ows:	
<del></del>			
			•
		Right	
		- Parties	
		Signature	•
		Diagram One	CA5-11
		Title	( 1/4/ 1 K
			NAV.
was	ma M M >> 0/27/1	9	14-22/11
	Notary Public	JOAN JOAN	INA GYETKO
This reno	ort ** contains (check all applicable boxes):	NOTARY PU	BLIC, STATE OF OHIO
xi (a) H	Facing Page.	CUYAL	IOGA COUNTY
_ · ·	Statement of Financial Condition.	OF OF ONLY COULIN,	Expires Dec. 23, 2019
	Statement of Income (Loss).		
	tatement of Changes in Financial Condition		
図 (e) S □ (f) S	statement of Changes in Stockholders' Equit	ty or Partners' or Sole Proprietors' Capital.	
_ ``	tatement of Changes in Liabilities Subordin Computation of Net Capital.	nated to Claims of Creditors.	
	Computation of Net Capital.  Computation for Determination of Reserve R	Paguiromenta Durament to Bulle 15-2-2	
	information Relating to the Possession or Co	introl Requirements Under Rule 15c3-3.	
	Reconciliation, including appropriate expla	mation of the Computation of Net Capital Under	Rule 15c3-1 and the
C	computation for Determination of the Reserv	ve Requirements Under Exhibit A of Rule 15c3.	3.
J (k) A	Reconciliation between the audited and un	audited Statements of Financial Condition with	respect to methods of
C	onsolidation.		
	on Oath or Affirmation.		
(III) A (n) A	copy of the SIPC Supplemental Report.	found to eviet or found to be a second to de la constant de la con	
- (11) 11	report accoming any material madequactes	found to exist or found to have existed since the d	ate of the previous audi

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

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# Hobe & Lucas

Certified Public Accountants, Inc.

4807 Rockside Road, Suite 510 (P) 216.524.8900 Independence, Ohio 44131 (F) 216.524.8777 www.bohe.com

#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of Inverness Securities, LLC Beachwood, Ohio

#### **Opinion on the Financial Statements**

We have audited the accompanying statements of financial condition of Inverness Securities, LLC as of December 31, 2018 and 2017, and the related statements of operations, changes in member's equity and cash flows for the years then ended, and the related notes and schedules (collectively referred to as the financial statements). In or opinion, the financial statements present fairly, in all material respects, the financial positions of Inverness Securities, LLC as of December 31, 2018 and 2017, and the results of its operations and cash flows for the year then ended in conformity with the accounting principles generally accepted in the United States of America.

#### **Basis for Opinion**

These financial statements are the responsibility of Inverness Securities, LLC's management. Our responsibility is to express an opinion on Inverness Securities, LLC's financial statements based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to Inverness Securities, LLC in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audits in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to fraud or error. Our audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis for our opinion.

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#### **Supplemental Information**

The Supplemental Schedules of Computation of Net Capital Pursuant to Rule 15c3-1 of the Securities and Exchange Commission and Computation for Determination of Reserve Requirements and Information Relating to the Possession or Control Requirements Pursuant to Rule 15c3-3 of the Securities and Exchange Commission have been subjected to audit procedures performed in conjunction with the audit of Inverness Securities, LLC's financial statements. The supplemental information is the responsibility of Inverness Securities, LLC's management. Our audit procedures include determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplemental information. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presenting in conformity with 17 C.F.R. §240.17a-5. In our opinion, the supplemental information is fairly stated, in all material respects, in relation to the financial statements as a whole.

Hobe + Lucas Certified Aublic Accountants Inc.

We have served as Inverness Securities, LLC's auditor since 2012.

Independence, Ohio February 26, 2019

#### STATEMENTS OF FINANCIAL CONDITION

December 31, 2018 and 2017

	 2018	2017
ASSETS		
Cash and cash equivalents	\$ 70,470	\$ 59,355
Accounts receivable	121,664	101,992
Other assets	 44,347	 36,768
	\$ 236,481	\$ 198,115
LIABILITIES AND MEMBER'S EQUITY		
Accounts payable and accrued expenses	\$ 22,480	\$ 15,319
Member's equity	214,001	 182,796
	\$ 236,481	\$ 198,115

## STATEMENTS OF OPERATIONS

## for the years ending December 31, 2018 and 2017

	2018	2017
Revenues:		
Commissions	\$ 105,220	\$ 59,550
Hedge fund advisory fee income		854
Trails & Other fee income	2,113,060	2,004,966
Total revenues	2,218,280	2,065,370
Expenses:		
Exchange and processing support fees	11,389	12,993
Ticket charges	,	22,413
Bank charges	15	186
Legal and professional fees	7,400	7,400
Dues and subscriptions	20,157	5,976
Insurance	33,487	23,716
Regulatory fees, licenses, and permits	34,494	25,478
Office supplies, postage, and delivery	12,027	9,259
Rent	20,756	15,600
Salaries and benefits	157,765	222,400
Registered representatives' commissions	1,091,703	1,088,863
Travel and entertainment	5,400	6,000
Telephone	630	876
Research	-	3,375
Total expenses	1,395,223	1,444,535
Other income:		
Interest income	3,148	1.000
	5,148	1,908
	3,148	1,908
Net income	\$ 826,205	\$ 622,743

# STATEMENT OF CHANGES IN MEMBER'S EQUITY for the years ending December 31, 2018 and 2017

Member's equity, December 31, 2016	\$	122,788
Net income		622,743
Contributions from member		151,512
Distributions to member		(714,247)
Member's equity, December 31, 2017		182,796
Net income		826,205
Contributions from member		-
Distributions to member	<del></del> .	(795,000)
Member's equity, December 31, 2018	\$	214,001

### **STATEMENTS OF CASH FLOWS**

for the years ending December 31, 2018 and 2017

		2018		2017
Cash flows from operating activities:				
Net income	\$	826,205	\$	622,743
Adjustments to reconcile net income to net				
cash provided by operating activities:				
Changes in operating assets and liabilities:				
Increase in accounts receivable		(19,672)		(53,137)
Increase in other assets		(7,579)		(10,777)
Increase in accounts payable and				
accrued expenses		7,161		14,930
Net cash provided by operating activities		806,115	<u></u>	573,759
Cash flows from financing activities:				
Contributions from member		_		151,512
Distributions to member	—	(795,000)		(714,247)
Net cash used by financing activities	<u></u>	(795,000)		(562,735)
Net increase (decrease) in cash and cash equivalents		11,115		11,024
Cash and cash equivalents, beginning of year		59,355		48,331
Cash and cash equivalents, end of year	\$	70,470	\$	59,355

# NOTES TO FINANCIAL STATEMENTS for the years ended December 31, 2018 and 2017

#### 1. Summary of Significant Accounting Policies:

**Company Activities** – Inverness Securities, LLC (the Company) is a broker-dealer registered with the Securities and Exchange Commission (SEC) and the State of Ohio, and is a member of the Financial Industry Regulatory Authority (FINRA).

The Company is engaged in a single line of business as a securities broker-dealer, which comprises several classes of services, including agency transactions.

**Securities Transactions** – Customers' securities transactions and related commission income and expenses are reported on a trade date basis. Amounts receivable and payable for securities transactions that have not reached their contractual settlement date are recorded net on the statements of financial condition.

Cash and Cash Equivalents – The Company maintains its cash in deposit accounts, which, at times, may exceed federally insured limits. The Company has not experienced any significant losses in such accounts. Management of the Company believes it is not exposed to any significant credit risk. The Company considers certificates of deposit to be cash equivalents.

Expenses – Clearing expenses are recorded on a trade date basis as securities transactions occur.

**Concentration of Credit Risk** — The Company is engaged in various trading and brokerage activities in which counterparties primarily include broker-dealers, banks, and other financial institutions. In the event counterparties do not fulfill their obligations, the Company may be exposed to risk. The risk of default depends on the creditworthiness of the counterparty or issuer of the instrument. It is the Company's policy to review, as necessary, the credit standing of each counterparty.

**Accounts Receivable** — Accounts receivable are uncollateralized commission obligations due under normal trade terms requiring payments within 30 days from the report date. The Company generally collects receivables within 30 days and does not charge interest on accounts receivable with invoice dates over 30 days old. Accounts receivable are stated at the amount billed. Payments of accounts receivable are allocated to the specific invoices identified on the remittance advice or, if unspecified, are applied to the earliest unpaid invoices.

The carrying amount of accounts receivable is reduced by a valuation allowance that reflects management's best estimate of the amounts that will not be collected. Management individually reviews all accounts receivable balances that exceed 90 days from the invoice date and based on an assessment of current credit worthiness, estimates the portion, if any, of the balance that will not be collected. Additionally, management estimates an allowance for the aggregate remaining accounts receivable based on historical collectability. At December 31, 2018 and 2017, there were no accounts receivable that exceeded 90 days past due. In the opinion of management, at December 31, 2018 and 2017, all accounts were considered collectible and no allowance was necessary.

# NOTES TO FINANCIAL STATEMENTS, Continued for the years ended December 31, 2018 and 2017

#### 1. <u>Summary of Significant Accounting Policies</u>, Continued:

Income Taxes – The Company has elected to be taxed under the provisions of the Internal Revenue Code as a limited liability company. Under those provisions and similar provisions of state law, the Company does not pay income taxes on its taxable income. Instead, the member is liable for individual income taxes on the Company's taxable income. Accordingly, there is no provision for income taxes in the financial statements.

The Company accounts for uncertainties in income taxes in accordance with accounting principles generally accepted in the United States of America, which provides for financial statement recognition and measurement of tax positions taken or expected to be taken in a tax return that have a greater than 50% chance of not being allowed under examination. No such positions have been recorded in the December 31, 2018 and 2017 financial statements. If such positions were taken, the resulting interest and penalties would be recognized as income tax expense.

As of December 31, 2018, the Company's federal income tax returns are subject to examination by the Internal Revenue Service for the years 2014 and thereafter.

**Estimates** — Management uses estimates and assumptions in preparing financial statements in accordance with accounting principles generally accepted in the United States of America. Those estimates and assumptions affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities, and the reported revenue and expenses. Actual results could vary from the estimates that were used.

**Reclassifications** – Certain reclassifications have been made to the 2017 financial statements to conform with the 2018 presentation.

**Subsequent Events** – Management of the Company has evaluated subsequent events through February 26, 2019, the date which the financial statements were available to be issued.

#### 2. Related Parties:

The Company is affiliated through common management and ownership with another limited liability corporation. The Company has an expense sharing agreement with the affiliated company for certain expenses related to rent, salaries and benefits, technology, utilities, and supplies. The Company's allocation of shared expenses totaled approximately \$194,000 in 2018 and \$252,000 in 2017.

#### 3. Net Capital Provision of Rule 15c3-1:

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities Exchange Act of 1934, the Company is required to maintain a minimum net capital balance, as defined, under such provisions.

The Company's minimum capital requirement is the greater of \$5,000 or 6\%% of aggregate indebtedness, as defined, under Securities and Exchange Commission Rule 15c3-1(a)(1), as it does not maintain customer accounts. Net capital may fluctuate on a daily basis. At December 31, 2018 and 2017, the Company had net capital of \$46,934 and \$43,169, respectively, which was \$41,934 and \$38,169, respectively, in excess of its required net capital of \$5,000.

# NOTES TO FINANCIAL STATEMENTS, Continued for the years ended December 31, 2018 and 2017

#### 3. Net Capital Provision of Rule 15c3-1, Continued:

In addition to the minimum net capital provisions, Rule 15c3-1 requires that the Company maintain a ratio of aggregate indebtedness, as defined, to net capital, of not more than 15 to 1. At December 31, 2018 and 2017, the ratio was .479 to 1 and .355 to 1, respectively.

#### 4. Exemption From Rule 15c3-3:

Up to July, 31, 2017, the Company acted as an introducing broker or dealer, promptly transmitting all funds and delivering all securities received in connection with its activities as a broker or dealer and did not otherwise hold funds or securities for or owe money or securities to customers. The Company operated under Section (k)(2)(ii) of Rule 15c3-3 of the Securities Exchange Act of 1934 and was therefore exempt from the requirements of Rule 15c3-3. Subsequent to July 31, 2017, the Company acted as limited business broker dealer transacting directly with various mutual funds and variable annuities companies. The Company operated under Section (k)(1) of Rule 15c3-3 of the Securities Exchange Act of 1934 and was therefore exempt from the requirements of Rule 15c3-3.

#### 5. <u>Termination of Custody Arrangement:</u>

The Company's custody arrangement with Pershing LLC was terminated effective July 31, 2017. Pershing took direct custody of any assets that remained on the platform after this date but a vast majority of these assets were transferred to other unaffiliated custodial broker dealers.

#### 6. Revenue from Contracts with Customers:

In May, 2014, FASB issued Accounting Standards Update (ASU) No. 2014-09, Topic 606, Revenue from Contracts with Customers. This new revenue recognition standard eliminates the transaction-and industry-specific revenue recognition guidance and replaces it with a principle-based approach for determining revenue recognition. The core principle of Topic 606 is that an entity should recognize revenue to depict the transfer of goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. FASB ASU No. 2014-09, Topic 606 was implemented for fiscal year beginning January 1, 2018.

#### Significant Judgments

Revenue from contracts with customers includes commission income and trails & other fee income. The recognition and measurement of revenue is based on the assessment of individual contract terms. Significant judgment is required to determine whether performance obligations are satisfied at a point in time or over time; how to allocate transaction prices where multiple performance obligations are identified; when to recognize revenue based on the appropriate measure of the Company's progress under the contract; and whether constraints on variable consideration should be applied due to uncertain future events.

#### 6. Revenue from Contracts with Customers, Continued:

Commissions. The Company buys and sells securities on behalf of its customers. Each time a customer enters into a buy or sell transaction, the Company may receive a commission. Commissions are recorded on the trade date (the date that the trade order is filled). The Company believes that the performance obligation is satisfied on the trade date because that is when the underlying financial instrument or purchaser is identified, the pricing is agreed upon and the risks and rewards of ownership have been transferred to/from the customer.

Trails & Other Fee Income. The Company enters into arrangements with mutual funds or other pooled investment vehicles (funds) to distribute shares to investors. The Company may receive distribution fees paid by the fund up front, over time, upon the investor's exit from the fund, or as a combination thereof. The Company believes that its performance obligation is the sale of securities to investors and as such this is fulfilled on the trade date. Any fixed amounts are recognized on the trade date and variable amounts are recognized to the extent it is probable that a significant revenue reversal will not occur once the uncertainty is resolved. For variable amounts, as the uncertainty is dependent on the value of the shares at future points in time as well as the length of time the investor remains in the fund, both of which are highly susceptible to factors outside the Company's influence, the Company does not believe that it can overcome this constraint until the market value of the fund and the investor activities are known, which are usually monthly or quarterly. Distribution fees recognized in the current period are primarily related to performance obligations that have been satisfied in prior periods including the continuing service on the account.

# SUPPLEMENTAL SCHEDULE OF COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION December 31, 2018 and 2017

	2018	2017
Net capital:  Total member's equity from statement of financial condition	\$ 214,001	\$ 182,796
Less nonallowable assets	(166,011)	(138,760)
Net capital before haircuts on securities	47,990	44,036
Haircuts on securities	(1,056)	(867)
Net capital	\$ 46,934	\$ 43,169
Computation of aggregate indebtedness - total liabilities from statement of financial condition	\$ 22,480	\$ 15,319
Computation of basic net capital requirement - 6-2/3% of aggregate indebtedness	<u>\$ 1,499</u>	\$ 1,021
Minimum required net capital	\$ 5,000	\$ 5,000
Net capital requirement	\$ 5,000	\$ 5,000
Excess net capital	\$ 41,934	\$ 38,169
Ratio of aggregate indebtedness to net capital	479 to 1	.355 to 1

A reconciliation of the computation of net capital under Rule 15c3-1 as included in the Company's unaudited Form X-17a-5 as of December 31, 2018, filed with the Securities and Exchange Commission and the amount included in the above computation is not required as there were no audit adjustments.

SUPPLEMENTAL SCHEDULES OF COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS AND INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS PURSUANT TO RULE 15c3-3 OF THE SECURITIES AND EXCHANGE COMMISSION for the years ended December 31, 2018 and 2017

The Company is not required to present the schedules "Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3" and "Information Relating to the Possession or Control Requirements Under Rule 15c3-3" as it meets the exemptive provisions of Rule 15c3-3, under Section (k)(1) of the Rule.

# INVERNESS SECURITIES, LLC STATEMENT OF EXEMPTION PURSUANT TO RULE 15C3-3

**DECEMBER 31, 2018** 

## Hobe & Lucas

Certified Public Accountants, Inc.

4807 Rockside Road, Suite 510 Phone: (216) 524.8900 Independence, Ohio 44131 Fax: (216) 524.8777

http://www.hobe.com

#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member Inverness Securities, LLC Beachwood, Ohio

We have reviewed management's statements, included in the accompanying Statement of Exemption Pursuant to Rule 15c3-3, in which (1) Inverness Securities, LLC identified the following provisions of 17 C.F.R. §15c3-3(k) under which Inverness Securities, LLC claimed an exemption from 17 C.F.R. §240.15c3-3(k)(1) (exemptive provisions) and (2) Inverness Securities, LLC stated that Inverness Securities, LLC met the identified exemptive provisions throughout the most recent fiscal year without exception. Inverness Securities, LLC's management is responsible for compliance with the exemptive provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about Inverness Securities, LLC's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to about for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(1) of Rule 15c3-3 under the Securities Exchange Act of 1934.

rethfied Anblic Accountants Inc.

Independence, Ohio February 26, 2019

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#### **SEC RULE 15c3-3 EXEMPTIVE REPORT**

Inverness Securities, LLC (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. § 240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- a. Inverness Securities, LLC is exempt from SEC Rule 15c3-3 (SEC Customer Protection Rule) pursuant to exemptive paragraph 15c3-3(k)(1).
- b. Inverness Securities, LLC to the best of our knowledge has met the identified exemptive provision noted above throughout the most recent fiscal year of 2018 without exception.
- c. There were no exceptions noted.

**Inverness Securities, LLC** 

I, Robert Renner, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct.

Ву:	folish
Title:	Director- Operations
Date:	February 19, 2019

# Hobe & Lucas

Certified Public Accountants, Inc.

4807 Rockside Road, Suite 510 Independence, Ohio 44131 Phone: (216) 524.8900 Fax: (216) 524.8777

http://www.hobe.com

## Report of Independent Registered Public Accounting Firm on Applying Agreed-Upon Procedures

To the Member of Inverness Securities, LLC Beachwood, Ohio

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934 and the SIPC Series 600 Rules, we have performed the procedures enumerated below, which were agreed to by Inverness Securities, LLC and the Securities Investor Protection Corporation (SIPC) with respect to the accompanying General Assessment Reconciliation (Form SIPC-7) of Inverness Securities, LLC for the year ended December 31, 2018, solely to assist you and SIPC in evaluating Inverness Securities, LLC's compliance with the applicable instructions of General Assessment Reconciliation (Form SIPC-7). Inverness Securities, LLC's management is responsible for Inverness Securities, LLC's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Public Company Accounting Oversight Board (United States). The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SPIC-7 with respective cash disbursement records entries, including the general ledger, bank statements and copies of checks, noting no differences;
- 2. Compared the Total Revenue amount reported on the Annual Audited Report Form X-17A-5 Part III for the year ended December 31, 2018 with the Total Revenue amount reported in Form SIPC-7 for the year ended December 31, 2018 noting no differences;
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers (Excel spreadsheets derived from the general ledger) that were prepared by management noting no differences;
- 4. Recalculated the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers (Excel spreadsheet derived from the general ledger) that were prepared by management supporting the adjustments noting no differences; and
- 5. Not applicable there is no overpayment.

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We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance with the applicable instructions of the Form SIPC-7. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Hobe + lucas Certified Aublic Accountants, Inc.

Independence, Ohio February 26, 2019

# (36-REV 12/18)

Disposition of exceptions:

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300

General Assessment Reconciliation

(36-REV 12/18)

For the fiscal year ended 12/31/2018 (Read carefully the instructions in your Working Copy before completing this Form)

#### TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

					1.41 1.4
	10°10°*****1983*******************************	ADC 220	**************************************	mailing labe any correction	of the information shown on the I requires correction, please e ma ons to form@sipc.org and so he form filed.
	INVERNESS SECURITIES LLC 6060 PARKLAND BLVD STE 200 STE CLEVELAND, OH 44124-4226			contact resp	lephone number of person to ecting this form.
	management and a second		*** **************	Kosta	- RENAER (216)839-5130
				•	
Α.	General Assessment (item 2e from page 2)		• .		s 1722
В.	Less payment made with SIPC-6 filed (exclud	le interest)	• .		(
c.	Date Paid Less prior overpayment applied				1
D.	Assessment balance due or (overpayment)				638
E.	Interest computed on late payment (see ins	truction E) for da	ys at 20% p	er annum	Ø
F.	Total assessment balance and interest due	(or overpayment carrier	forward)		\$ 638
4	PAYMENT: √ the box Check mailed to P.O. Box ☑ Funds Wire Total (must be same as F above)	du ACHU	638		
н. я	Overpayment carried forward	\$(	N. N.		
	idiaries (S) and predecessors (P) included	in this form laive name		n ranietration	number):
Subs	refunes (o) and predecessors (r) mediued	m mis form (give name	and 1934 AC	or region anon	
SIP son	'C member submitting this form and the by whom it is executed represent thereby information contained herein is true, correctiplete.		[nverde	ss Sec	A1217ES LLC.
SIP son t all com	C member submitting this form and the by whom it is executed represent thereby information contained herein is true, correc	1	Invited to the second of the s	orporation, Parliners (Authorized S	CIZITES LLC.
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SIP son all com	C member submitting this form and the by whom it is executed represent thereby information contained herein is true, correct plete.  The day of FERMING. 20 19 m and the assessment payment is due 60 riod of not less than 6 years, the latest 2	l	Invitate (Name of C) Portion of the fiscal y	(Authorized S  ECTON O  (Title)	nip or other prognization) gnature) PERMIN S
SIP son all com	C member submitting this form and the by whom it is executed represent thereby information contained herein is true, correctionally and the assessment payment is due 60 riod of not less than 6 years, the latest 2 es:	days after the end of years in an easily acc	Invitate (Name of C) Portion of the fiscal y	(Authorized S  ECTON O  (Title)	nip or other prognization) gnature) PERMIN S

# DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning 1/1/2018 and ending 12/31/2018

Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		Eliminate cents \$ 2, 221, 426
Additions:     (1) Total revenues from the securities business of subsidiaries predecessors not included above.	s (except foreign subsidiaries) and	Ø
(2) Net loss from principal transactions in securities in trading	accounts.	B
(3) Net loss from principal transactions in commodities in tradi		- K
(4) Interest and dividend expense deducted in determining item		Ø
(5) Net loss from management of or participation in the underw	riting or distribution of securities.	B
(6) Expenses other than advertising, printing, registration fees profit from management of or participation in underwriting of	and long food deducted in determining	0
(7) Net loss from securities in investment accounts.		Ø
Total additions		Ø
2c. Deductions: (1) Revenues from the distribution of shares of a registered open investment trust, from the sale of variable annuities, from the advisory services rendered to registered investment comparaccounts, and from transactions in security futures products	ne business of insurance, from investment	1,073,251
(2) Revenues from commodity transactions.		8
(3) Commissions, floor brokerage and clearance paid to other Si securities transactions.	IPC members in connection with	Ø
(4) Reimbursements for postage in connection with proxy solicite	ation.	Ø
(5) Net gain from securities in investment accounts.		Ø
(6) 100% of commissions and markups earned from transactions (ii) Treasury bills, bankers acceptances or commercial paper from issuance date.	in (i) certificates of deposit and that mature nine months or less	N
(7) Direct expenses of printing advertising and legal fees incurre related to the securities business (revenue defined by Section	d in connection with other revenue n 16(9)(L) of the Act).	8
(8) Other revenue not related either directly or indirectly to the si (See instruction C):	ecurities business.	· · · · · · · · · · · · · · · · · · ·
(Deductions in excess of \$100,000 require documentation)	annughtum filt fairle de la company after annue an	N. N. S.
(1000000 of \$100,000 require documentation)		
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	IIA Line 13,	
<ul><li>(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).</li></ul>	\$	
Enter the greater of line (i) or (ii)		Ø
Total deductions		1,073 251
2d. SIPC Net Operating Revenues	\$ <u>.</u>	1, 148, 175
2e. General Assessment @ .0015	\$	1722
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